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March 15, 2018

**Via Federal Express:**

I-Jung Chiang  
Superfund Branch, 6RC-S  
EPA Region 6  
1445 Ross Ave., Ste. 1200  
Dallas, TX 75202

Re: SPA Shipyard Superfund Site, Jennings, LA, ASAOC, CERCLA Docket No. 06-08-16; Financial Assurance Requirement

Dear I-Jung:

Per our recent discussions, our group is revising its package of performance bonds and letters of credit that comprise its total financial assurance obligation of \$1.5 million, originally submitted to EPA by letter to you dated February 2, 2017. With the recent amendment to our ASAOC, two new members are now contributing to our collective obligation. Accordingly, we are submitting herewith new financial assurance instruments on behalf of new members Ingram and Evergreen (Sunoco) and revised instruments on behalf of ACBL, Martin, Hornbeck and Cenac (Cenac's revised Letter of Credit was sent directly to EPA by its financial institution). The revised instruments merely reduce the amount each of those members is obligated to assure to reflect the additional amounts now being covered by the two new members. Some members decided not to reduce their individual assurance obligation and their original instrument remains unchanged. EPA already has those. This will mean that our total combined assurance will actually exceed the amount required in our ASAOC.

Below is a summary of our revised financial assurance submission. Note the new instruments and revised instruments are effective March 15, 2018.

MAR 16 REC'D

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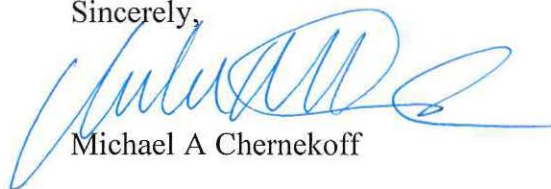
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ACBL:	Formerly \$600,00, revised to \$540,000 (Original Rider enclosed)
Ashland:	Unchanged at \$90,000 (Original Performance Bond in EPA's possession)
Canal Barge:	Unchanged at \$30,000 (Original Performance Bond in EPA's possession)
Cenac Towing	Formerly \$262,500, revised to \$237,000 (Revised Letter of Credit submitted directly to EPA)
Hornbeck:	Formerly \$60,000, revised to \$54,000 (Original Rider enclosed)
Martin:	Formerly \$142,500, revised to \$129,000 (Original Rider enclosed)
Phillips 66:	Unchanged at \$315,000 (Original Performance Bond in EPA's possession)
Ingram:	New obligation at \$91,500 (Original Letter of Credit enclosed)
Evergreen:	New Obligation at \$57,000 (Original Performance Bond enclosed)
Total:	\$1,543,500.

Please advise if you have any questions.

Sincerely,



Michael A Chernekoff

MAC/  
Enclosures